



Shannon B. Vandermeer
Partner

August 16, 2023

Via CM/ECF

Hon. Lawrence J. Vilardo
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

**Re: Warmus v. Wyoming County, et al.
Case Number: 1:23-cv-00812-LJV**

Dear Judge Vilardo:

I represent Wyoming County ("County") in the above-referenced matter. This firm will be representing the individual defendants in this litigation. Since serving the County, Plaintiff has been gradually serving the individual defendants. As such, the deadlines to respond to Plaintiff's Complaint vary amongst the Defendants.

Currently, at least one of the Defendants must respond to the Complaint by August 18, 2023. On August 14 and August 16, I contacted Plaintiff's counsel and suggested we agree to a new deadline for all the Defendants to respond collectively. I explained to Plaintiff's counsel that this avoids piecemeal responses. Plaintiff's counsel has not responded to my request.

Therefore, I respectfully request that the Defendants have until September 18, 2023 to respond to Plaintiff's Complaint. If this request is acceptable with the Court, I respectfully request that Your Honor "so order" this correspondence and have it electronically filed with the Clerk's Office.

Thank you for your consideration.

Very truly yours,
WEBSTER SZANYI LLP

s/ Shannon B. Vandermeer
Shannon B. Vandermeer

SBV:lar

SO ORDERED:

Hon. Lawrence J. Vilardo, U.S.D.J.

August 16, 2023

Page 2

CC: Penberthy Law Group LLP
Brittany L. Penberthy, Esq.
Attorneys for Plaintiff
227 Niagara Street
Buffalo, NY 14201
716-803-8400
bpenberthy@thepenlawgroup.com